



**National
Urban League**

*Empowering Communities.
Changing Lives.
For An Equitable Future.*

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**Public Comment to the Census National Advisory Committee Meeting,
November 4-5, 2021**

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Submitted to shana.j.banks@census.gov**

Background

The National Urban League is pleased to present public comments to the U.S. Census Bureau's National Advisory Committee on Racial, Ethnic and Other Populations for consideration during its Fall 2021 Advisory Committee meeting. Our comments specifically address a potentially large 2020 Census Black undercount, as at least two new preliminary research studies point to a significantly higher 2020 Census Black undercount than in 2010. Not only does such a steep increase in the Black undercount raise concerns about whether Black communities lose out on fair political representation, but also the loss of billions of dollars in federal funding for Covid-19 emerging communities and other needs each year, for the next 10 years.

Months ahead of the Census Bureau's release of its Post Enumeration Study, expected next year, a simulation comparing the Census Bureau's estimates for 2020 with results from 2010 indicates that the country's Black population may have been undercounted at a rate up to *three times as high* as in 2010. A second report suggests the undercount of Black children could be up to 10 times as high as a decade ago.

Though preliminary, we cannot allow these projections to go unaddressed while we await the Census Bureau to release its own "report card" on 2020 census success. There are data points, process and 2020 Census operational metrics that could inform stakeholder understanding of the depth of the undercount for our community, implications for governance and federal funding allocations. We join other stakeholders in asking for more transparency and granular data ahead of the release to understand fully, Post Enumeration Survey implications.

Black Undercount Concerns

The National Urban League and its 2020 Census Black Roundtable were initially encouraged by 2020 Census improvements to the race question—specifically, removing the term “Negro” from the questionnaire and adding diverse examples from the Black diaspora (i.e., Jamaican, Nigerian, and Haitian), to increase Black response to the Census, particularly among Black foreign-born respondents. Similarly, we applauded 2020 Census questionnaire redesign to improve the count of young children 0-4 years old, especially given the alarming net undercount of Black and Hispanic children in the preceding 2010 Census, exceeding 7 percent.

Nonetheless there were disturbing signs throughout the 2020 Census that a significant Black undercount was underway, compounded by a global pandemic, weather emergencies, and extraordinary partisan, political interference by former Trump administration to eliminate undocumented immigrants from the Census, and to stop the Census count early. The latter action was particularly egregious as research shows that the Nonresponse Follow Up (NRFU), operation is critical for obtaining an accurate Black count, given Black populations were disproportionately reflected in the 2020 Census Nonresponse universe.

Undercounted Black immigrants

According to Census data and other research studies (i.e., Pew Research), minimally one-in-ten Blacks living in the U.S. is foreign born. A significant undercount of Black foreign-born respondents could potentially have a devastating impact on the overall Black count. In assessing 2020 Census response rates of predominantly Black immigrant-populated census tracts in New York City, for example, (the Bronx, Brooklyn, and Queens), the City University of New York’s response rate analysis team found that in these immigrant rich Black areas, the average response rate was trending very low, (in June 2020), at 39.7 percent. Additional research from the Center for Urban Research at the Graduate Center, City University of New York (CUNY) further reflected that low self-response rates for foreign-born concentrated census tracts, overall fell short of reaching national census response rates in August 2020. Because of these analyses, we have concluded that Black and other foreign born predominant communities may not have reached the final 2020 Census national response rate of 67 percent, leading to a high undercount of Black immigrant and other foreign-born communities. Detailed data looking at foreign born participation in the Census could help ascertain whether there is a significant undercount of immigrant populations in the 2020 Census. Trump Administration efforts to stifle the immigrant count might have played a chilling

factor across race and ethnic population groups—including the Black population.

Group Quarters (prisons)

The Census Bureau counted incarcerated persons at the location of their prisons in the 2020 Census, rather than in their home jurisdictions—a major contributor to prison-based gerrymandering. Given the disproportionate representation of the Black population in U.S. prisons—for example, Black Americans are incarcerated in state prisons at nearly 5 times the rate of white Americans, obtaining complete data on the demographic characteristics of prison populations is important. Further, in 12 states, more than half the prison population is Black: Alabama, Delaware, Georgia, Illinois, Louisiana, Maryland, Michigan, Mississippi, New Jersey, North Carolina and South Carolina and Virginia (source: The Sentencing Project, October 2021). Close attention must be paid to ensure administrative records for this population accurately reflect demographic characteristics of the prison population as well as the correct municipal boundary of each prison.

This issue matters greatly to the redistricting process and the drawing of fair state legislative districts. The National Urban League will continue to advocate strongly for the Census Bureau to change its Residence Criteria to allow incarcerated individuals in county, state, and federal institutions, to be counted in their home jurisdictions. Similarly, youth held in juvenile detention facilities should be counted at their home of record just as the Census Bureau changed its 2020 Census Residence Criteria to allow boarding school occupants to be counted at their home addresses.

The National Urban League would like additional metrics on the accuracy and quality of 2020 Census administrative records data for prisons, colleges, and other Group Quarters facilities.

Undercounted Black Children

Dr. William O'Hare's recent research on undercounted children suggests a much greater undercount of young Black and Brown children in the 2020 Census, than in 2010. For all children, research suggests the net undercount increased from 1.7 percent in 2010 to 2.1 percent in 2020. For Hispanic children (0-17 years), preliminary research estimates a 2020 undercount of 4.4 percent vs. 2.1 percent in 2010. Since young children have a higher net undercount than older children, these data do not bode well for young Black and Brown children 0-4 years old in the 2020 Census. A second report suggests the undercount of Black children could be up to 10 times as high as a decade ago. Seven percent of Black children were overlooked in the previous census. A higher 2020 Census

undercount of Black children by any degree, greatly enhances the probability of a significant Black undercount, overall.

Fellow children's advocates (i.e., Partnership for America's Children), are submitting public comments and recommendations to the National Advisory Committee on this issue. The National Urban League has worked closely with Partnership for America leadership on this issue, and we align our comments with their recommendations for more extensive process data and operational metrics on the children's count.

Within Household Omissions: Undercounted Black Men

Most important, the National Urban League is interested in Census Bureau data on "within household" omissions. Specifically, errors or omissions of individuals *within* the "99 percent" of households which the Census Bureau frequently indicates it has "accounted" for. We would like to see within household omission data for young Black children who all too frequently are left off the Census form, and for Black men, (15.6 percent of whom, ages 18-29 were missed in the 2010 Census, 16.7 percent aged 30-49 years were omitted in 2010, and 9.2 percent aged 50+ were entirely missed in the 2010 census, as well (according to 2010 Census coverage estimates). The consistent, ever growing, unabated omission rate for Black men is appalling, given the extraordinary economic and political representation implications associated with this differential gap. Within household omissions by race and ethnicity and local geography would aid in helping stakeholders as well as the Census Bureau address the root causes of this profound undercount, and related federal funding implications for impacted local communities.

In addition to these concerns, the National Urban League requests additional information on the following:

- The number of *single person households* enumerated by the census, by race and ethnicity, mode (i.e., proxy, administrative records, imputation), and lower levels of geography. Given the pandemic and the large number of renters and extended family households in Black communities, we believe that high incidences of single person households in predominantly Black communities could be erroneous or a function of unreliable proxy information and/or other enumeration methods.
- Lower geography (substate), indicators of proxy, administrative records usage, and imputation, by race and ethnicity.
- Regional variations in the undercount, especially in southern, (hurricane hit) states and localities where an estimated 50 percent or more of the

U.S. Black population currently resides. This huge swath of the total Black population was enumerated by a single Census Regional Office, (Atlanta) covering the following states: N.C., S.C., FLA, GA, MS, LA, ALA. Undercounts and omissions of Black populations in these states would play a large role in the undercount of the Black population, overall.

Similarly, the census count in western U.S. states was likewise affected by an environmental threat—wildfires. The National Urban League would like process and operational metrics (enumerations by proxy, administrative records, imputation, etc.), by region, for cross regional comparison, and any remediation efforts taken to ensure a complete count. The U.S. Census Bureau reported in NAC meetings prior to the census that it was prepared to continue the enumeration effort if faced with weather emergencies such as hurricanes. It would be helpful to understand what accommodations were put into place given the impact of these circumstances on so many communities overall, particularly Black communities in the south.

In closing, it is important for stakeholders to understand that net undercounts mask the true undercount of our populations. Net undercounts do not tell us how many people were missed in the Census and it is worth noting that even when a net undercount for a group is zero, there are often omissions.

Based on Dr. Connie Citro's preliminary analysis, the *net* undercount for Black Americans in 2020 would be 2 million (vs. the Census *net* undercount of 827,000 Black people in 2010). However, for 2020, based on this preliminary research, the overall number of Black people who were *fully* "uncounted" (omitted) from the Census could be closer to 10 million, this decade.

The important distinction between net undercounts and omissions (actual people missed), must be made and clarified here for public policy decisions. According to Census coverage data, last decade, 9.3 percent of the Black population (3.8 million) was uncounted, (omitted) in the 2010 Census vs. the smaller net undercount of Black people cited above. Omission rates are more accurate depictions of people missed in the census than the net undercount because Census takes into consideration *overcounts* (typically white homeowners who are counted twice), and then adjusts the (typically high) omissions of racial and ethnic populations to account for white overcounts. This certainly masks the actual number of people fully missed in the census. Perhaps the Census Bureau should revisit the way it calculates undercounts for racial and ethnic populations to reflect more accurate dimensions of the problem.

The African American population has been historically undercounted in the decennial census, disadvantaging their families, communities, and neighborhoods. The political inequities and federal funding implications for Black

communities are far too great for the National Urban League, national leaders, state, and local decision makers to continue to ignore. We need reliable, accurate data for governance, social equity, federal funding allocations and representation. Specifically, we need to know how the Census Bureau will address this issue if significant undercounts in the Black population are found. What opportunities are there to adjust the data? Will the Census Bureau issue guidelines and cautions to policy makers and data users on how to properly use the data if significant errors (i.e., response and nonresponse), are found to contribute to high undercounts? Finally, what research will the Census Bureau undertake to resolve this issue in the next census? Essentially, what is the Census Bureau's commitment to addressing the differential undercount in 2030?

We commend the Census Bureau for completing the Census under historic, unprecedented circumstances and understand that "official" numbers on the undercount will not be known until the Census Bureau releases the results of its Post Enumeration Survey next year. In the meantime, the National Urban League looks forward to increased Census engagement, transparency, and granular metrics and data on how the Black population and other communities of color were counted in the 2020 Census.

Sincerely,



Marc H. Morial
President and Chief Executive Officer
National Urban League
November 2, 2021

APPENDIX

The National Urban League

The National Urban League is a historic civil rights organization dedicated to economic empowerment, equality, and social justice. Founded in 1910, and headquartered in NYC, the Urban League collaborates with national, local and community leaders, as well as corporate partners to elevate the standards of living for African Americans and other historically underserved groups.

We accomplish this mission through our 90 local affiliates serving 300 communities across 37 states and the District of Columbia, providing direct services to more than two million people annually. In addition, National Urban League affiliates provided substantial outreach and education during the 2020 Census.

National Urban League Efforts to Improve the 2020 Census Count

- Active member of the U.S. Census Bureau's National Advisory Committee.
- Fully participated in the 2020 Census Counts Campaign
- Established a 2020 Census Black Roundtable comprising Black clergy, civil rights organizations, local and state elected leaders, nonprofits, children's advocacy groups, and organizations serving Black immigrants. The Black Roundtable's role was to share best outreach practices, coordinate 2020 Census messaging, engage Congressional Black Caucus members, local and state elected leaders on key Census concerns and jointly develop outreach strategies to increase self-response. Roundtable focus: counting Black men, young children, Black immigrants, re-entering former inmate populations, rural and urban communities, and those residing in Internet and broad band deserts.
- Established a "Make Black Count" website, posting the latest 2020 Census developments, and important messaging--especially during the pandemic.
- Fully activated the National Urban League network of 90 local Affiliates to conduct Get Out the Census education and outreach.
- Filed litigation suing former President Donald Trump and the Department of Commerce to ensure that *all* populations, especially Black and other historically undercounted populations are afforded a fair and complete count, and so that Census employees had ample time to process and tabulate Census responses.